

### **Remarks**

The Abstract has been amended in a fashion which it is believed complies with the Examiner's request as set forth in paragraph 2 of the Office action.

With respect to the claim objections set forth in paragraph 4, the error and misnumbering of the claims is regretted. Applicant notes that Claims 10-34 have been renumbered 9-33.

Claims 1-11 and 19-21 stand rejected under 35 U.S.C. 112, second paragraph. With respect to Claim 1, the Examiner is correct that the claim is intended to be drawn to the combination of the centralizer and the receptacle, for purposes of present prosecution. As to Claims 19 and 21, the rejection is not understood. Claim 18 recites that there is an upset transition zone on one side of the upset portion, and that the upset transition zone has a transition outer zone diameter which decreases with distance axially away from the upset portion. This is clearly shown in Fig. 2 wherein the upset is designated as 30 and the at least one transition zone is shown as 36.

With respect to Claims 19-21, the two recited transition zones are also shown in Fig. 2 in the sense that there is another transition zone on the opposite side of upset 30 which is spaced axially from transition zone 36. In other words, a first transition zone shown as 36 in Fig. 2 would be generally above centralizer 26 and the second transition zone referenced would be generally below centralizer 26. In any event, Applicant respectfully submits that the transition zones set forth in Claims 19-21 are related to the upset

transition zone referred to in Claim 18 save for the fact that Claims 19 and 21 refer to two transition zones which, as explained above, are shown in Fig. 2. Claim 18 is simply broader in the sense that it only requires a single transition zone. In other words, conceivably there could be one transition zone between the pipe OD and the upset but that the pipe from the opposite side of the upset would essentially have the same OD as the upset.

Turning to the art rejections, Claims 1, 10 and 12 stand rejected as being anticipated by *Halkyard*. The rejection is respectfully traversed. For a rejection of anticipation to stand, each and every claimed element must be shown by the reference. With respect to *Halkyard*, the Examiner refers specifically to Fig. 4. However, it can be seen that in the context of Claims 1, 10 and 11 *Halkyard* does not disclose or suggest an upset portion formed on the metallic pipe which has an upset outer greater diameter greater than the pipe outer diameter. More specifically, *Halkyard* is devoid of any showing of a centralizer that is heat shrink mounted or in any other way mounted to such an upset portion. Accordingly, it is respectfully submitted that Claims 1, 10 and 11 are patentable over *Halkyard*. It is further to be noted that Applicant takes issue with the Examiner that the recitation of heat shrink lends no patentable weight to Claim 1. In reality, the recitation to "heat shrink mounted" can be considered a structural limitation vis-a-vis the manner that the centralizer is connected to the upset portion of the pipe.

Claims 1-3, 10, 11, 18-20, 29, 32 and 33 stand rejected as anticipated by *Finn et*

*al.* The rejection is respectfully traversed. To begin with, the remarks above with respect to the limitation of heat shrink forming no patentable weight are reiterated with respect to this rejection.

As noted above, for a reference to be anticipating each and every element of the claim must be shown in the reference. The *Finn et al* reference does not show an upset portion formed on the metallic pipe. In point of fact, as can be seen from column 10, lines 39 *et seq*, the shaft 86 is made up of a pair of tapered pipe sections 90 having flanges 92 on one end which are joined together end to end. That same description is equally applicable to the embodiment of *Finn et al* shown in Figs. 10 and 11 and in this regard the Examiner's attention is respectfully directed to column 11, lines 18 *et seq* where it is taught that the keel joint 106 has a more compact sleeve 108 that fits closely around flanges 92 of pipe sections 90. In other words, the embodiment shown in Fig. 11 as in the case of Figs 9 and 10 depicts the two ends of pipe sections each having a flange on their end which are connected as by bolts shown in Fig. 10. Such a construction can hardly be considered an upset. That being the case, Claims 1-3, 10, 11, 18-20, 29, 32 and 33 are clearly patentable over *Finn et al*.

Claims 12 and 14 stand rejected as anticipated by *Angman*. The rejection is respectfully traversed. *Angman* does not show the formation of an upset portion. Element 16 in *Angman* is a retaining collar and not an upset. With respect to this rejection and the other rejections dealing with "an upset" or variants thereof, an upset is customarily

considered a monolithic portion of a tubular or the like on which it is formed and is not considered a sleeve, flange or the like. In any event, *Angman* does not show an upset portion, since Claim 14 depends upon Claim 12 and since it has been clearly demonstrated that *Angman* does not teach or disclose an upset, it is respectfully submitted that both Claims 12 and 14 are patentable over *Angman*.

Claims 4 and 21-28 stand rejected as obvious over *Finn et al.* This rejection is likewise respectfully traversed. Claim 4 depends upon Claim 1 which as demonstrated above is clearly patentable over *Finn et al.* Accordingly, since Claim 4 further limits Claim 1 it is likewise patentable over *Finn et al.*

With respect to Claims 21-28, those claims all depend upon Claim 18, which as demonstrated above, is clearly patentable over *Finn et al.* in that Claim 18 calls for an upset portion and *Finn et al.* discloses no such structure. Accordingly, since Claims 21-28 further limit Claim 18, it is respectfully submitted those claims are patentable over *Finn et al.*

Claims 5-8, 15-17 and 30 stand rejected as obvious over *Finn et al.* in view of *Morris*. The rejection is respectfully traversed. Claims 5-8 depend upon Claim 1, which as demonstrated above, is clearly patentable over *Finn et al.* The infirmities of *Finn et al.* vis-a-vis rendering Claim 1 unpatentable are not cured by resort to *Morris*. Accordingly, it is respectfully submitted that Claims 5-8 are clearly patentable over *Finn et al.* in view of *Morris*. With respect to Claims 15-17, the Examiner admits that *Finn et al.* fails to teach or suggest a rigid centralizer containing an annular groove which is positioned to reduce the

amount of stress created on a selected portion of the metallic pipe due to impact or hard contact. In an attempt to cure this infirmity of *Finn et al*, the Examiner relies on *Morris* which shows a rod guide for a sucker rod having multiple grooves. There is no way that *Finn et al* and *Morris* could be combined to arrive at Applicant's claimed structure. To begin with, *Morris* does not teach or suggest an annular groove as specifically called for by Claim 15-17. Furthermore, and as specifically stated in Claim 16, the claimed groove is not for the purpose of facilitating flow of fluids but rather to limit radially directed forces from being transmitted through the annular groove in the corresponding portion of the rigid construction centralizer as a result of impact or hard contact between the receptacle and the centralizer. *Morris* is simply non-analogous art. The grooves of *Morris*, aside from not being annular, do not, in any way, serve to redirect radial forces in any direction. *Morris* simply discloses a rod guide which has nothing to do with Applicant's centralizer system. The combination of *Morris* with *Finn et al* is simply inapposite. Accordingly, it is respectfully submitted Claims 5-8, 15-17 and 30 are patentable over *Finn et al* in view of *Morris*.

Claims 9 and 31 stand rejected as being unpatentable over *Finn et al* in view of *Halkyard*. This rejection is also respectfully traversed. Claim 9 is dependent upon Claim 1. As has been demonstrated above, Claim 1 is clearly patentable over *Finn et al*. The infirmities of *Finn et al* are not cured by resort to *Halkyard*. Accordingly, Claim 9 is clearly patentable over that combination of references. With respect to Claim 31, a like situation applies since Claim 31 is ultimately dependent upon Claim 19 and it has been shown that

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Claim 19 is, in no way, rendered unpatentable by *Finn et al.* Accordingly, it is respectfully submitted that Claims 9 and 31 are clearly patentable over *Finn et al* in view of *Halkyard*.

Claim 13 stands rejected as being unpatentable over *Angman* in view of *Morris*. This rejection is also traversed. The fact that *Morris* is clearly non-analogous art and that the grooves therein are for an entirely different purpose than the annular groove called for in Claim 13. Again, it is to be noted that *Morris* in no way discloses an annular groove, a fact which is understandable since the grooves of *Morris* are simply designed to aid flow and have nothing to do with reducing stress in the rod guide. It is respectfully submitted that Claim 13 is patentable over *Angman* in view of *Morris*.

In view of the foregoing amendments and remarks, it is respectfully submitted that all claims are in condition for allowance which is hereby earnestly solicited and respectfully submitted.

Respectfully submitted,



C. James Bushman  
Reg. No. 24,810

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BROWNING BUSHMAN  
5718 Westheimer, Suite 1800  
Houston, TX 77057  
Tel.: (713) 266-5593  
Fax: (713) 266-5169

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By: \_\_\_\_\_

Cathy Hayes